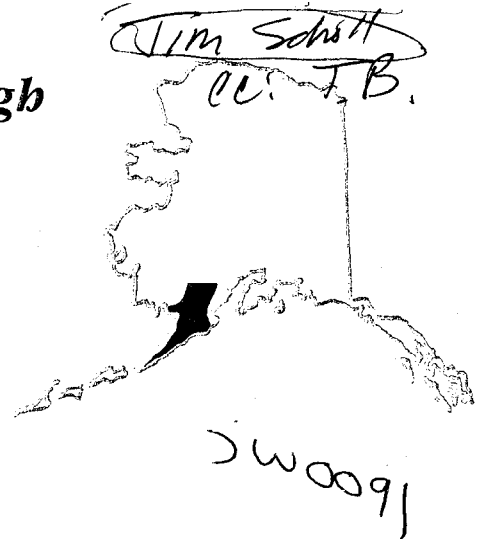


Lake and Peninsula Borough

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September 18, 1999

Mr. John Tolley
Chief, Planning and Administration
ADOT/PF – Central Region
4111 Aviation Ave.
P.O. box 196900
Anchorage, AR. 99519-6900

SUBJ: Borough Comments: **Draft** Needs List / **Pre-Draft STIP** / Proposed State Highway System

Dear Mr. Tolley:

Enclosed are the Lake and Peninsula Borough's comments on the draft update to the Transportation Needs and Priorities (Needs List), the **pre-draft** Statewide Transportation Improvement Program (STIP), and the proposed State Highway System. Comments on each are provided separately below.

Transportation Needs And Priorities List.

Overall, we believe the Department has done a very good job compiling a comprehensive list of the transportation needs and priorities that exist in the Borough. Our comments are:

1. We believe the Department should either update the priority rankings or eliminate them completely. We thought that they were tied to the score a project received and perhaps that was the case in the beginning. However, they are just causing confusion now. For example, the Iliamna-Nondalton Road is ranked as a Priority 3 and it is a project that the Department is currently working on.
2. It is our understanding that the landfill access road in Chignik is completed. We believe this was a PHS project. Please check with the City administration on the status of this road. It may be that this is one project that can be eliminated from the List.
3. The project descriptions for the Chignik Airport Access Road Rehabilitation project and the Chignik Area Inter-Village Road are the same. This is editorial in nature.

NOT in STIP

4. It is our understanding that the Chignik Lagoon Landfill Access Road project is currently being constructed by PHS. Please consult with the Chignik Lagoon Village Council on the status of this project. This may also be a project that could be eliminated **from** the List.
5. Koliganek is not in the Lake and Peninsula Borough. This comment is also editorial in nature.
6. The road to the Perryville tsunami shelter has been constructed. It is in need of some upgrades but it is basically done. The Borough used grant money to help the Village Council get this accomplished. This is a project that can be dropped from the list.
7. Please add a small boat harbor to the Perryville Needs List. The Corps of Engineers is very interested in this project. It has completed an initial feasibility report and is seeking **funding** for a **full** feasibility study. The state harbor engineer is aware of the project and is currently helping the Borough and the Perryville Council secure the local match for the study.
8. Please add a road to access the landfill and a proposed new boat launch facility on Ugashik River to the needs List for Pilot Point. This is a project that the Village Council and the City have asked the Borough to support. I'm not sure if either body has contacted your office.
9. Cross Peninsula Highway / Chignik to Port Heiden: This project has the support of all of the communities in the Southern part of the Borough. The Borough Assembly recently voted to add it to its CIP and Transportation Priority List. Please add this project to the Needs List. This is an alternative currently being evaluated by the Southwest Region Transportation Plan planners.

Statewide Transportation Improvement Program

In general, we were very disappointed to see that there was only one Lake and Peninsula Borough project included in the **Pre-Draft STIP**. There are two Borough priority projects that we would like to discuss in particular.

Williamsport-Pile Bay Road: The Borough is shocked and "bewildered" to say the least about the fact that this project does not appear in the STIP. This project has been a top Borough priority for the past decade. It enjoys very broad based support in the region including support **from** all of the communities in the Lake Clark-Lake Iliamna region. Upgrading this road would have very broad economic benefits to the entire region including communities in Bristol Bay. We have submitted a great deal of paperwork over the years to demonstrate that this project meets the intent of the project scoring criteria.

We understand that this project scored very high using **DOT/PFs** objective project scoring criteria. It should therefore appear in the STIP. Somehow this project must have been removed **from STIP** consideration when it reached Juneau for final consideration. This raises serious questions about the integrity of the entire project selection process. We have supported **DOT/PFs** scoring and evaluation process in the past. We felt that it was a well intentioned effort to bring some fairness and objectivity to the project selection process. It is certainly an improvement over the old discretionary **funding**

method of doling out projects. However, what took place here seems to undermine the whole process and that is unfortunate.

We would like **DOT/PF** to be aware that leaving this project out of the **STIP** has implications beyond the **STIP** itself. For example, it makes it less likely that we will be able to secure other **funding** for upgrades and repairs. For example, the Borough has applied for **funding from** the Economic Development Administration pursuant to the federal economic disaster relief program. **DOT/PF** has in fact tentatively agreed to provide some of the local match. We have also applied for construction and engineering assistance from the military under the Innovative Readiness Training Program.

Finally, we'd like the Department to know that we are actively talking to the Kenai Peninsula Borough about the maintenance issue. If the Kenai Borough is unable to help us with maintenance, we are willing to attempt to annex this area so that the entire road and port are within the Lake and Peninsula Borough. If that happens, we will be able to make a serious commitment to routine maintenance.

The Borough **respectfully** asks that **DOT/PF** reconsider its decision to leave this project out of the **STIP**. It deserves to be there. We are willing to provide the Department with any additional information it may need to **further** evaluate the merits of the project. We look forward to discussing this project with you soon and will be making follow-up phone calls and visits to your offices in both Anchorage and Juneau.

Chianik Inter-Village Road

The Borough continues to be disappointed that this project does not score high enough to make the **STIP**. This project remains a top Borough priority and it has very strong support in Chignik, Chignik Lagoon, and Chignik Lake. Constructing this road would have very positive economic implications for this area.

Last year we asked **DOT/PF** to **rescore** this project based upon new information the Borough and the Bristol Bay native Corporation provided. This information included confirmation that the three affected Native Corporations would dedicate and contribute a R.O.W. for the entire road corridor. We received a follow-up letter **from** John Horn in which he offered to come to Chignik and see the project for himself. We never **followed-up** on that letter and we take responsibility for that.

We hope to be able to invite Mr. Horn and other **DOT/PF** officials to Chignik soon. In the meantime, we still hope to discuss the routine maintenance issue with **DOT/PF**. We need more information regarding how **DOT/PF** would define routine maintenance and more information regarding insurance and liability issues. We intend to ask the department again to re-score this project **after** some of the issues noted above are addressed **further**.

Proposed State **Highway** Svstem

The Borough believes that creating a State Highway System is a good idea in general. The Borough has supported this idea in concept in the past. It makes sense to split up the existing CTP program because the types of projects contained there are so diverse in scope and nature. It is hard to compare and score these projects because it is like comparing apples and oranges. We believe however, that this is a very important step and that a longer public review process should have been provided. This proposed program was buried within a much larger “Needs” document and was probably overlooked by many reviewers. We have several other concerns and comments.

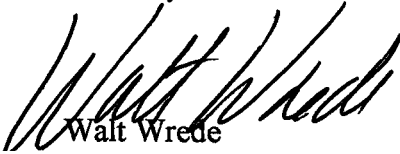
1. The Borough believes that any effort to create a State Highway System and to reclassify State roads should include an evaluation of which roads currently maintained by the State could be taken over by a local government. In short, criteria should also be developed to establish which roads should be transferred to local governments. We believe there are many roads in this category. For example, we see no reason why the State should maintain the Old Seward Highway and all of the major roads on the Anchorage hillside. These are local roads that should be owned and maintained by the Municipality of Anchorage. There are a number of roads in Fairbanks, Juneau, the Mat-Su Borough, and other municipalities that fall in this category as well. It is really troubling to rural Alaskans to see that the State is maintaining roads that are in-fact local in nature. This makes it hard to accept the notion that **DOT/PF** will not build new roads in rural Alaska unless a local government agrees to assume ownership and/or maintenance. Dropping some of the existing roads on the State’s maintenance list will provide for a more equitable distribution of resources.
2. We are very concerned about how the **funding** pot will be divided between CTP and SHS projects. We understand that you are proposing that only 10 million dollars or 6% be taken from CTP **funding** to establish the SHS program. However, this is just a proposal and could be changed at any time in the **future**. We think that a more formal **funding** allocation formula should be established and that there should be safeguards instituted that involve the public before the formula could be changed. Our fear is that there will eventually be pressure **from** the legislature to fund only projects that are on the SHS. In the current budget climate, it is not hard to imagine the Legislature making the argument that the State should only worry about the basic core components of the State transportation network. This might eventually provide a tool for those who don’t think any new projects in rural Alaska should be funded. Such a scenario would exacerbate the inequities that we believe already exist. We believe this may be one of the risks or downsides of creating a State Highway System.
3. In the section that includes the distinguishing characteristics the Commissioner may consider when deciding which roads to include in the SHS, we have the following comments. First, the criteria should include access to other types of economic development potential and not be limited to minerals and tourism (3.(a) 6). Second, you should add a **function/criteria** for roads that connect existing communities that are in relatively close proximity so that commercial activities, public services, health care, education etc. can be enhanced and more efficiently provided. This would compliment **function 3.(b)**. Third, we have reservations about **function 3. (C)**. This could be used to **justify** some of the roads we mentioned above that should be

dropped from the State system. The Palmer Wasilla Highway comes immediately to mind. Fourth, the terms "arterial" and "major collector" should be precisely defined, especially if this will be an important distinguishing characteristic of the SHS system. These terms imply a bias toward metropolitan or urban roads. It will be hard for most rural roads to meet this standard as commonly used unless roads that are intermodel connectors are included.

4. We would recommend adding the proposed Iliamna-Nondalton Road to the list of Proposed State Highway System Facilities. Although this road is not yet completed, it is included in the STIP and **DOT/PF** anticipates construction in 2000. This road will meet the proposed SHS criteria. It will connect three communities and the regional airport at Iliamna. It will also provide better access to recreational opportunities in Lake Clark National Park. NOT IN STIP
5. We believe the process for adding new roads to the SHS should be spelled out. For example, the proposed Chignik Inter-Village Road will certainly meet the SHS standards as proposed in this document. We are concerned that the State will not allow new roads into the SHS system because of concerns about additional maintenance costs. This could end up being another vehicle to force local rural communities to agree to maintain new roads. In other words, we can imagine the State taking the position that it will maintain roads on the SHS system but not roads on the CTP system; especially new roads in the bush.

The Lake and Peninsula Borough appreciates the opportunity to comment. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,


Walt Wrede
Borough Manager

c.

Commissioner Perkins
Jeff Ottesen, Statewide Planning Chief